

Exhibit 45

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3 UNITED STATES DISTRICT COURT
4 SOUTHERN DISTRICT OF NEW YORK

5

6 FRANCESCO GALLO,
7 Plaintiff,

8 -against-

Case No.

9 07CV06418 (CM) (HP)

10 ALITALIA-LINEE AEREE ITALIANE-
11 SOCIETA PER AZIONI, PIERANDREA GALLI,
12 and GIULIO LIBUTTI,

13 Defendants.

14)

15

16 DEPOSITION OF LINDA LOPES
17 New York, New York
18 Wednesday, March 12, 2008

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Reported by: CAPRICE LATHE
Job No.: 10350

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25

1 L. LOPEZ

2 A When he came to the company. I really
3 don't remember the exact year.

4 Q A decade?

5 A It must have been like 2000 -- I'm not too
6 sure of the date.

7 Q Did you like him?

8 A I had no problem with him.

9 Q Did you know Pierandrea Galli?

10 A Yes, I did.

11 Q Did you have any problem with him?

12 A No, I didn't.

13 Q Did you ever hear Giulio Libutti say
14 anything derogatory about gays?

15 A No.

16 Q Older people?

17 A No.

18 Q Women?

19 A No.

20 Q Did you ever hear of him saying any such
21 comments?

22 A No, I didn't.

23 Q Did he ever call Mr. Gallo a homosexual?

24 A No.

25 Q Same question for Pierandrea Galli.

1 L. LOPEZ

2 A No.

3 Q Did you ever report to Mr. Gallo?

4 A Yes.

5 Q When was that?

6 A Maybe it was 2003.

7 Q And what was your position back then?

8 A I was a representative -- payroll

9 representative.

10 Q And what was Mr. Gallo's position?

11 A He was VP -- I don't remember the exact
12 position.

13 Q Was it regulatory affairs?

14 A I think so.

15 Q You remained in that position up until
16 when?

17 A I was a payroll representative until -- I
18 think it was 2005.

19 Q Do you remember what month?

20 A I think it was July.

21 Q And what happened in July of 2005?

22 A I was promoted.

23 Q And that was to what position?

24 A To the coordinator -- payroll and benefits
25 coordinator.